



May 23, 2011

***Ex Parte Notice***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

***Petition for Rulemaking to Transition Part 22 Cellular Services to Geographic Market Area Licensing, RM-11510***

Dear Ms. Dortch:

On May 20, 2011 Carri Bennet, General Counsel for the Rural Telecommunications Group and the undersigned (collectively, the “Rural Representatives”), met with Ruth Milkman, Roger Noel, Michael McKenzie, Lloyd Coward, Jennifer Flynn, and Nina Shafran, all of the FCC’s Wireless Telecommunications Bureau. The parties discussed CTIA’s Petition for Rulemaking to transition Part 22 cellular licenses from site-based to geographic market-area licensing. The discussion focused on how a transition to geographic market-area licensing might take place, including a potential overlay auction, time frames, and a temporary cellular licensing freeze. The Rural Representatives expressed concern about how a “substantially licensed” territory would be defined and the length of time between the licensing phases. The Rural Representatives indicated that they would discuss the matter further with their memberships.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Jill Canfield  
Jill Canfield  
Director, Legal & Industry

JMC:rhb

cc: Ruth Milkman  
Roger Noel  
Michael McKenzie  
Lloyd Coward  
Jennifer Flynn  
Nina Shafran